

ENTERED

April 29, 2025

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	CASE NO: 24-31596
MMA LAW FIRM, PLLC,	§	
Debtor.	§	CHAPTER 11
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CRISTOBAL M. GALINDO P.C.,	§	
Plaintiff,	§	
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VS.	§	ADVERSARY NO. 25-3310
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MMA LAW FIRM, PLLC,	§	
Defendant.	§	

**COMPREHENSIVE SCHEDULING,
PRE-TRIAL & TRIAL ORDER**

A pretrial scheduling conference was held on **Monday, April 28, 2025**. Under authority of Fed. R. Bankr. P. 7016 and Fed. R. Civ. P. 16, it is hereby: **ORDERED**: that the following deadlines and settings shall apply in the above referenced adversary:

1. **Monday, May 12, 2025**, Christobal M. Galindo, P.C. must file its complaint.
2. **Friday, May 30, 2025**, MMA Law Firm, PLLC must file its answer.
3. **Monday, June 30, 2025**, necessary parties must be joined.
4. **Monday, June 30, 2025**, a Notice of Consent or Non-Consent, as required by BLR 7008-1 and 7012-1, to the entry of final orders by the United States Bankruptcy Court on all non-core matters must be filed. **Any Party who fails to file their Notice of Consent or Non-Consent by the deadline imposed in Paragraph 3 of this Order or Fed. R. Bankr. P. 9027(e)(3) if applicable, will have been deemed to have Consented to the entry of final orders or judgments by the United States Bankruptcy Court on all non-core matters.** Pursuant to Fed. R. Bankr. P. 9027(e)(3), any party who has filed a pleading in connection with the removed claim or cause of action, other than the party filing the notice of removal, shall file a statement that the party does or does not consent to entry of final orders or judgment by the bankruptcy court. A statement required by this paragraph shall be signed pursuant to Rule 9011 and shall be filed not later than 14 days after the filing of the notice of removal. Any party who files a statement pursuant to this paragraph shall mail a copy to every other party to the removed claim or cause of action.
5. **Tuesday, August 26, 2025**, (“Close of Fact Discovery”) all fact discovery in this case will close, meaning that Parties must have fulfilled all outstanding requests before Close of Fact

Discovery in that Parties must not make requests that cannot be completed before Close of Fact Discovery.

6. **Tuesday, September 9, 2025**, the party with the burden of proof on an issue must serve its expert reports.
7. **Tuesday, September 23, 2025**, rebuttal expert reports must be served.
8. **Tuesday, October 7, 2025**, (“Close of Expert Discovery”) all expert discovery in this case will close, meaning that Parties must have fulfilled all outstanding requests before Close of Expert Discovery in that Parties must not make requests that cannot be completed before Close of Expert Discovery.
9. **Thursday, November 6, 2025**, all Dispositive Motions (limited to 20 pages, excluding exhibits), if any, must be filed.
10. **Thursday, November 20, 2025**, responses (limited to 15 pages, excluding exhibits), if any, must be filed.
11. **Thursday, December 4, 2025**, Witness and Exhibit Lists must be exchanged.
 - a. Copies of the exhibits must be attached to the Witness & Exhibit List and filed in compliance with General Order 2021-5 and filed with the Clerk of Court.
 - b. Parties must utilize Form 1-100 Witness & Exhibit List which can be located on this Court’s home page at <https://www.txs.uscourts.gov/content/chief-united-states-bankruptcy-judgeeduardo-v-rodriguez>
12. **Thursday, December 11, 2025**, Counsel must meet face to face to attempt to resolve these issues amicably, to attempt to stipulate to as many facts and issues as possible, and to prepare the pretrial order. The court intends that this will be a substantive, good faith effort to resolve issues. Therefore, trial counsel (lead counsel) are required to attend this meeting in person or virtually.
13. **Monday, January 5, 2026**, the Parties must jointly prepare and file a proposed form of pretrial order. The proposed form of order must be signed by counsel for all Parties and must provide the following:
 - a. Statement as to jurisdiction;
 - b. Stipulation of facts in ascending order by date and citations to the record and/or exhibits;
 - c. Stipulation of exhibits;
 - d. Proposed findings of fact and conclusions of law;
 - e. Designation of witnesses to be presented by deposition;
 - f. A list of depositions to be used at trial for purposes other than potential impeachment with identification of specific pages and lines proposed to be published to the trier of facts;
 - g. Pending motions that need to be addressed;
 - h. A combined estimate of time (total time) needed for trial of each case;
 - i. Certificate of conference along with signatures of all counsel;
12. **Wednesday, January 14, 2026, at 1:30 p.m. (Central Standard Time)** a Pre-Trial Conference will be held at the United States Bankruptcy Court, Bob Casey Federal Building, Courtroom No. 8B, 515 Rusk Ave. Houston Texas 77002. Attendance by all Parties is required, either in person (if not represented by counsel) or by an attorney who has authority to bind the Party. Each Party must have a representative present with full settlement

authority.

13. Pursuant to Bankruptcy General Order 2021-05 and Bankruptcy Local Rule 9017-1, parties may either appear electronically or in person unless otherwise ordered by this Court.

14. To participate electronically, parties must follow the instructions set forth on Judge Rodriguez's web page located at: <https://www.txs.uscourts.gov/content/united-states-bankruptcy-judge-eduardo-v-rodriguez>. Parties are additionally instructed to: (i) call in utilizing the dial-in-number for hearings before Judge Rodriguez at **832-917-1510**, conference room number 999276 **and** (ii) log on to GoToMeeting for video appearances and witness testimony, utilizing conference code: judgerodriguez. **Parties MUST HAVE TWO SEPARATE DEVICES to appear by video and telephonically. One device will be used to log on to GoToMeeting and the other will be used to call the telephonic conference line.**

15. Changes to this Scheduling Order may only be made by further order of the Court. A motion to extend any deadline and/or alter any hearing date will only be granted for good cause shown beyond the control of the lawyers and/or Parties and only in very limited circumstances.

SIGNED April 28, 2025



Eduardo V. Rodriguez
Chief United States Bankruptcy Judge